

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PUERTO RICO ENERGY CARIBE LLC,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, *et al.*

Defendants.

CIVIL No. 20-1591 (ADC)

TOTALENERGIES MARKETING PUERTO RICO
CORP.,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, *et al.*

Defendants.

CIVIL No. 20-1725 (ADC)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COME NOW, the **Commonwealth of Puerto Rico**; **Pedro R. Pierluisi**, in his official capacity as Governor of Puerto Rico; **Domingo Emanuelli-Hernández**, in his official capacity as Secretary of Justice; **Guarionex Díaz-Martínez**, in his official capacity as Deputy Secretary of Antitrust Affairs; and **Francisco González De La Matta**, in his official capacity as Secretary of the Department of Consumer Affairs (hereinafter “Defendants”), without waiving any right or defense arising from Title III of *Puerto Rico Oversight, Management and Economic Stability Act* (“PROMESA”), 48 U.S.C. §§2101 *et seq.*, and the Commonwealth’s Petition under said Title or under this case and, through the undersigned attorney, very respectfully **STATE** and **PRAY** as follows:

1. On this date the appearing Defendants will file a Joint Response in Opposition to Plaintiffs’ Motion for Summary Judgment that includes an Opposing Statement of Facts for both Plaintiffs PRE and TotalEnergies. However, the Opposing Statement for TotalEnergies will be filed in a separate Docket. Been that the Court granted

the Protective Order at Docket No. 135-1 (Docket Nos. 136 and 178), out of an abundance of caution, Defendants will file the Joint Response in Opposition to Plaintiffs' Motion for Summary Judgment for case participants only.

WHEREFORE, the appearing Defendants respectfully request that the Court grants the instant motion.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court, who will send notification of such filing to the parties subscribing to the CM/ECF System.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of November 2024.

DOMINGO EMANUELLI-HERNÁNDEZ

Secretary of Justice

SUSANA PEÑAGARÍCANO-BROWN

Deputy Secretary in Charge of Civil Litigation

JUAN C. RAMÍREZ ORTIZ

Deputy Undersecretary in Charge of Civil Litigation

s/ Pablo Tufiño-Soto

PABLO TUFÍÑO-SOTO

USDC No. 304006

Department of Justice of Puerto Rico

Federal Litigation Division

P.O. Box 9020192

San Juan, Puerto Rico 00902-0192

Email: ptufino@justicia.pr.gov

Phone: 787-721-2900 Ext. 1423

s/ Idza Díaz Rivera

IDZA DÍAZ RIVERA

USDC NO. 223404

Email: ldiaz@justicia.pr.gov

Phone: 787-721-2900, Ext. 1421